## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF GEORGIA WAYCROSS DIVISION

EDWARD SCOTT, SHANNON	)	
AKIN and DEBBIE RICHARDS,	)	
et al., on behalf of themselves and all	)	
others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION NO.
v.	)	5:18-CV-00006-LGW-RSB
NORTH AMERICAN INNS, LLC,	)	
PAUL D. SHARMA, AND SHAUN	)	
B. SHARMA,	)	
	)	
Defendants.	)	

## CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

COME NOW, Defendants North American Inns, LLC ("NAI"), Paul D. Sharma and Shaun B. Sharma (the "Sharma Parties") (hereinafter NAI and Sharma Parties are referred to as "Defendants") and Plaintiffs EDWARD SCOTT, SHANNON AKIN and DEBBIE RICHARDS ("Plaintiffs") and hereby submit this consent motion for an extension of time within which Defendants must answer, move or otherwise respond to Plaintiffs' Complaint. Plaintiffs have agreed to this extension. In support, Defendants shows as follows:

1. Plaintiffs filed this action on January 30, 2018.

2. Defendants North American Inns, LLC and Paul D. Sharma were

served on January 31, 2018.

3. Pursuant to Fed. R. Civ. P. 12(a) Defendants' response is currently

due by February 20, 2018.

4. The parties have agreed to allow Defendants until March 20, 2018, to

respond to the Complaint in exchange for Defendants' agreement to toll the statute

of limitations for the putative plaintiffs effective January 31, 2018, the date upon

which service was perfected upon Defendants NAI and P. Sharma.

5. Defendants respectfully request that an extension of time be granted

through and including March 20, 2018 by which Defendants must Plaintiffs'

Complaint. All parties have agreed to this extension.

6. All time periods relating to Plaintiffs' time to name additional

plaintiffs to the collective action, shall be tolled during and after this extension.

7. The parties submit a proposed Order with this Motion.

Respectfully submitted, this 20<sup>th</sup> day of February 2018.

Tyler B. Kaspers

Ga. Bar No. 445708

The Kaspers Firm, LLC

152 New Street, Suite 109

Macon, Georgia 31201 (404) 944-3128 tyler@kasperslaw.com

REQUESTED AND CONSENTED TO BY: /s/ Howard P. Slomka
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Counsel for Defendants

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B. SHARMA,	)	
	)	
Defendants.	)	

## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 20, 2018, I filed the foregoing using the Court's CM/ECF system, and, upon agreement of counsel, sent an electronic copy of this document to:

Howard P. Slomka 2859 Paces Ferry Rd. SE. Suite 1700 Atlanta, Georgia 30339 hs@myatllaw.com

Tyler B. Kaspers

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Counsel for Plaintiffs